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JUL - 8 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 8, 1997

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Attention: Policy and Rules Division
Stop Code 1800D

Re: MM Docket Nos. 91-221, 87-8, 94-150, 92-51 and 87-154
Television Station WIRB(TV), Melbourne, Florida

Dear Sir or Madam:

On behalf of Channel 56 of Orlando, Inc., licensee of Television Station WIRB(TV), Melbourne, Florida, we submit herewith an original and four copies of the licensee's response to the FCC's June 17, 1997 *Public Notice* in the above-captioned proceedings. This submission concerns a Time Brokerage Agreement between Paxson Communications of Orlando-56, Inc. and Channel 56 of Orlando, Inc, the licensee of Television Station WIRB(TV), Melbourne, Florida.

Should any questions arise concerning this matter, kindly contact the undersigned.

Very truly yours,

John R. Feore, Jr.

JRF/lkr
Enclosure

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for JRCODE

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LMA REPLY FORM

MARKET: ORLANDO-DAYTONA BEACH-MELBOURNE, FLORIDA

DMA #: 22

					Degree of Overlap (%)			Nielsen (all day) Audience Share (9am - midnight)		
					City Grade	Grade A	Grade B	11/96	2/97	5/97
Brokered Station:	Channel No. & Call Sign Channel 56 WIRB(TV)	Network Affiliation Independent	Licensed Community Melbourne-Orlando, FL	Owner/Licensee Channel 56 of Orlando, Inc.	N/A			Not Available		
Brokering Station:	None*	N/A	N/A	Paxson Communications of Orlando-56, Inc.						

* Paxson West Palm Beach License, Inc., an affiliate of Paxson Communications of Orlando-56, Inc., is the licensee of Television Station WPBF-TV, Tequesta, Florida. There is Grade A and Grade B overlap between WIRB(TV) and WPBF-TV (Engineering Supplement to be provided).

LMA Specifics:	Date of LMA <u>Signing</u>	Length of <u>Initial Term</u>	Initial Term <u>Start Date</u>	Initial Term <u>End Date</u>	<u>Renewal Provisions/Terms</u> Describe renewal provisions including: (1) length of renewal, (2) at which party's option, (3) whether renewal is automatic, and (4) how renewal option may be exercised.	% Time Brokered <u>per week</u>
	8/31/95	10 years from date of FCC approval of Licensee's acquisition of station	8/31/95	8/31/05	May be mutually agreed upon for an additional term by both parties	Up to 58.3% (98 hours/week)

PUBLIC INTEREST BENEFITS RESULTING FROM ENTERING INTO THE LMA

PUBLIC INTEREST SHOWING FOR WIRB

The WIRB(TV) Time Brokerage Agreement was combined with financing by Paxson Communications of Orlando-56, Inc. that enabled Channel 56 of Orlando, Inc. a subsidiary of The Christian Network, Inc. to acquire WIRB(TV), Melbourne, Florida. Without the programming opportunity, Paxson Communications would not have been willing to provide the financing for the acquisition of this station and to enable CNI to obtain an over-the-air outlet for its Worship programming for up to seventy hours per week.